

THOMAS D. DILLARD, JR., ESQ.  
Nevada Bar No. 006270  
OLSON, CANNON, GORMLEY  
ANGULO & STOBERSKI  
9950 West Cheyenne Avenue  
Las Vegas, Nevada 89129  
Telephone: (702) 384-4012  
Facsimile: (702) 383-0701  
Attorney for Defendants  
Clark County, Lynn Marie Goya  
and Steve Wolfson (in their official  
capacities)

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

\* \* \* \* \*

UNIVERSAL LIFE CHURCH MONASTERY )  
a/k/a UNIVERSAL LIFE CHURCH, )

Plaintiff, )

vs. )

CLARK COUNTY, NEVADA; LYNN MARIE )  
GOYA (in her official capacity as Clark County )  
Clerk); STEVE WOLFSON (in his official )  
capacity as the Clark County District Attorney); )  
JANE DOE; JOHN ROE; and JANE POE, )

Defendants. )

CASE NO. 2:18-cv-02099-RFB-BNW

**STIPULATED CONFIDENTIALITY AGREEMENT AND PROTECTIVE ORDER**

Plaintiff UNIVERSAL LIFE CHURCH MONASTERY a/k/a UNIVERSAL LIFE  
CHURCH, by and through its attorneys of record, Ronald D. Green, Esq., and Defendants  
CLARK COUNTY, LYNN MARIE GOYA and STEVE WOLFSON (in their official  
capacities), and through their attorneys of the law firm of Olson, Cannon, Gormley & Stoberski,  
hereby stipulate and agree to the entry of this Confidentiality Agreement and Protective Order

(this "Protective Order") in regard to the production of documents submitted by third parties to Clark County pursuant to Plaintiff's government records request with regard to any private and confidential information of any third parties contained on those documents. Nonetheless, the Parties recognize that such documents or other evidence might be relevant to the issues raised by the pleadings herein. Accordingly, the Parties desire to mutually agree to certain terms under which copies of potentially relevant documents or evidence may be produced during the course of this case while at the same time respecting the confidential nature of those documents or evidence.

1. Plaintiff agrees not to utilize any personal identifier information for any other purpose outside of this instant litigation.

///

///

///

///

///

///

///

2. Plaintiff further agrees to hold confidential any personal identifier information on any third party and redact such information for any use of the documents in this litigation.

CONSENTED TO this 10<sup>th</sup> day of January, 2020.

RANDAZZA LEGAL GROUP, PLLC

OLSON CANNON GORMLEY &  
STOBERSKI

By /s/ Ronald D. Green  
Ronald D. Green, Esq.  
2764 Lake Sahara Drive, Ste. 109  
Las Vegas, Nevada 89117  
Attorney for Plaintiff

By /s/ Thomas D. Dillard, Jr.  
Thomas D. Dillard, Jr., Esq.  
9950 W. Cheyenne Ave.  
Las Vegas, NV 89129  
Attorney for Defendants  
Clark County, Lynn Marie Goya  
and Steve Wolfson (in their official  
capacities)

IT IS SO ORDERED

ORDER

DATED: January 13, 2020



BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE